

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

FRANKLIN CONSTRUCTION GROUP, LLC,

Plaintiff,

v.

Case No. 3:24-cv-01255

WILLIAM SHORE, JWSC, LLC, KEITH MEADOWS,  
JOSEPH HEATH, HYDS INC., DEAN BINGHAM,  
LUNDON JOHNSON, TYLER WEBER,  
JOEL CHEVRETTE, DANNY KNOWLES, SCOTT  
MATTHEWS and LOWE'S HOME CENTERS, LLC

JURY DEMAND

Defendants.

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DECLARATION OF JOEL CHEVRETTE

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STATE OF NORTH CAROLINA        )  
  )  
COUNTY OF UNION                )

I, Joel Chevette, do hereby state, testify and affirm the following under penalty of perjury:

1. My name is Joel Chevette. I am over eighteen (18) years of age and I have personal knowledge of all matters and facts set forth in this Declaration.
2. I have been sued as a Defendant in the above-captioned case.
3. I have received and reviewed the Complaint that was filed in this matter. As such, I am generally familiar with the allegations and I understand that Franklin Construction Group, LLC ("FCG") alleges various events or activities that occurred between 2021 and 2023, of which appear to form the basis of this lawsuit.



4. I am a citizen and resident of Union County, North Carolina. I currently live at 212 Summer Wood Place, Waxhaw, North Carolina 28173. I have been a resident of North Carolina for the past 19 years.

5. From 2021 through 2023, I was employed by Lowe's as a "Pro Sales Manager." I worked out of the Charlotte, North Carolina market and my territory included sixteen (16) Lowe's stores located in the greater Charlotte area.

6. As a Pro Sales Manager, I was assigned to customer accounts in my geographic territory – that being the greater Charlotte, North Carolina area.

7. During my time as a Pro Sales Manager for Lowe's, I had no customers or accounts located in the State of Tennessee.

8. During my time as a Pro Sales Manager for Lowe's, I did not travel to Tennessee for any business purpose or customer meetings.

9. During my time as a Pro Sales Manager for Lowe's, I did not have any job duties in the State of Tennessee, nor did I conduct any business in Tennessee.

10. During my time as a Pro Sales Manager for Lowe's, I did not call on customers in the State of Tennessee nor attempt to solicit business from customers Tennessee.

11. From 2021 through 2023, I had only been to the State of Tennessee one (1) time, and it was during the summer of 2022 when I went to Gatlinburg for a family vacation.

12. During my time as a Pro Sales Manager for Lowe's, FCG was never a customer or account that was assigned to me; and therefore, I had no dealings with FCG.

13. I do not own any real property in the State of Tennessee.

14. I do not rent a home or office in the State of Tennessee.

15. I do not have a bank account nor own any personal property in Tennessee.
16. I do not pay any taxes to the State of Tennessee.
17. I have not previously used the court system in the State of Tennessee as a litigant.

I declare and affirm under penalty of perjury that the information contained in this Declaration is true and correct to the best of my knowledge, information and belief.

**WITNESS MY HAND** this 9th day of January, 2025.

By: Joel Chevette  
Joel Chevette